MARIE WEST V. KELLY BURCH

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1
                IN THE UNITED STATES DISTRICT COURT
2
               FOR THE WESTERN DISTRICT OF OKLAHOMA
 3
 4
     MARIE KATHLEEN WEST,
 5
               Plaintiff,
 6
     VS.
                                ) CASE No. CIV-03-1019-L
 7
     KELLY HUNTER BURCH, in
     her individual capacity;
     TOM GRUBER, in his
 8
      individual capacity;
 9
      DREW EDMONDSON, in his
      official capacity; and
      THE STATE OF OKLAHOMA,
10
      ex rel., THE OFFICE OF
11
      THE ATTORNEY GENERAL, a
      constitutional state
12
      agency,
               Defendants.
13
14
        DEPOSITION OF ATTORNEY GENERAL W. A. DREW EDMONDSON
15
                 TAKEN ON BEHALF OF THE PLAINTIFF
16
                         ON OCTOBER 11, 2004
17
                    IN OKLAHOMA CITY, OKLAHOMA
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19
                         ORIGINAL
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                         CITY REPORTERS, INC.
22
                   117 PARK AVENUE, FIRST FLOOR
                   OKLAHOMA CITY, OKLAHOMA
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              REPORTED BY: KIM GLOVER, CSR, RPR, RMR
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EXHIBIT 13

MARIE WEST V. KELLY BURCH

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| 1 | APPEARANCES | |
| 2 | | |
| 3 | FOR THE PLAINTIFF: | |
| J | STAN WARD | |
| 4 | Attorney at Law | |
| | WARD & GLASS | |
| 5 | 629 24th Avenue SW Norman, Oklahoma 73069 | |
| 6 | Norman, Oktanoma 75009 | |
| | -AND- | |
| 7 | | |
| 8 | MICHAEL HAYES FREEMAN Attorney at Law | |
| Ü | THE FREEMAN LAW FIRM | |
| 9 | 1701 South Carson Avenue | |
| | Tulsa, Oklahoma 73119 | |
| 10 | FOR THE DEFENDANT KELLY HUNTER BURCH: | |
| 11 | FOR THE DEFENDANT REBET HONTER BORCH. | |
| | ELIZABETH R. SHARROCK | |
| 12 | Assistant Attorney General | |
| 13 | Office of the Attorney General 4545 N. Lincoln, Suite 260 | |
| 1.0 | Oklahoma City, Oklahoma 73105 | |
| 14 | , | |
| | FOR THE DEFENDANT TOM GRUBER: | |
| 15 | MARK LAWTON JONES | |
| 16 | Assistant Attorney General | |
| | Office of the Attorney General | |
| 17 | 4545 N. Lincoln, Suite 260 | |
| 18 | Oklahoma City, Oklahoma 73105 | |
| 19 | FOR THE DEFENDANT DREW EDMONDSON: | |
| 20 | CLYDE KIRK | |
| | Assistant Attorney General | |
| 21 | Office of the Attorney General | |
| 22 | 4545 N. Lincoln, Suite 260 Oklahoma City, Oklahoma 73105 | |
| 23 | OKTANOMA CICY, OKTANOMA 75105 | |
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| 1 | APPEARANCES (continued) | |
| 2 | | |
| 3 | FOR THE DEFENDANT STATE OF OKLAHOMA: | |
| 4 | SUSAN NOLAND Assistant Attorney General | |
| 5 | Office of the Attorney General | |
| 6 | 4545 N. Lincoln, Suite 260 Oklahoma City, Oklahoma 73105 | |
| 7 | ALSO PRESENT: MARIE KATHLEEN WEST | |
| 8 | KELLY HUNTER BURCH TRENT CORKEN | |
| 9 | TOM GRUBER | |
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MARIE WEST V. KELLY BURCH

DREW EDMONDSON

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STIPULATIONS

1.0

It is hereby stipulated and agreed by and between the parties hereto, through their respective attorneys, that the deposition of W. A. DREW EDMONDSON may be taken on behalf of the Plaintiff, on this, the 11th day of October, 2004, in the city of Oklahoma City, Oklahoma, by Kim Glover, Registered Merit Reporter and Certified Shorthand Reporter within and for the State of Oklahoma, pursuant to agreement.

It is further stipulated and agreed by and between the parties hereto, through their respective attorneys, that all objections to questions propounded and answers thereto made, except as to the form of the question or the responsiveness of the witness's answer, may be made at the time of the trial when said deposition is offered in evidence, with the same force and effect as if said objections were made at the time of the taking of this deposition.

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| 1 | ATTORNEY GENERAL W. A. DREW EDMONDSON, |
| 2 | of lawful age, being first duly sworn, testified on |
| 3 | his oath as follows: |
| 4 | DIRECT EXAMINATION |
| 5 | BY MR. WARD: |
| 6 | Q Mr. Edmondson, will you, please, state your |
| 7 | full name and business address? |
| 8 | A William Andrew Edmondson. My business |
| 9 | address is would be 112 State Capitol, Oklahoma |
| 10 | City, 73105, I believe. |
| 11 | Q How long have you been the Attorney General |
| 12 | for the State of Oklahoma? |
| 13 | A I was elected in November of '94 and took |
| 14 | office in January of '95. Almost 10 years. |
| 15 | Q Did you attend public schools in Muskogee? |
| 16 | A I did. |
| 17 | Q Did you graduate from Muskogee High School? |
| 18 | A It was Muskogee Central at the time. It's |
| 19 | Muskogee High School now. |
| 20 | Q Which college or university did you attend? |
| 21 | A Undergraduate at Northeastern State College |
| 22 | at the time, now university, and law school at the |
| 23 | University of Tulsa. |
| 24 | Q In what years did you receive your degrees |
| 25 | from Northeastern and University of Tulsa? |
| | |

MARIE WEST V. KELLY BURCH

DREW EDMONDSON

Page 117 1 JURAT 2 3 I, Attorney General W. A. Drew Edmondson, do hereby state under oath that I have read the above 4 5 and foregoing Deposition in its entirety and that the same is a full, true and correct transcription of my 6 testimony so given at said time and place, except for 7 the corrections noted. 8 9 10 11 DREW EDMONDSON 12 13 Subscribed and sworn to before me, the undersigned Notary Public in and for the State of 14 Oklahoma, by said witness, W. A. DREW EDMONDSON, 15 on this, the 27 to day of October 16 17 18 19 20 21 Lebruary 14, 2007 22 My Commission Expires: My Commission No. 03 002 687 23 Reported by: KIM GLOVER, CSR, RPR, RMR 24 25 ORIGINAL

DREW EDMONDSON

MARIE WEST V. KELLY BURCH

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| 1 | |
| 2 | CERTIFICATE |
| 3 | |
| 4 | STATE OF OKLAHOMA)) SS. |
| 5 | COUNTY OF OKLAHOMA) |
| 6 | |
| 7 | I, KIM GLOVER, Oklahoma Certified Shorthand |
| 8 | Reporter and Registered Merit Reporter, certify that |
| 9 | Attorney General W. A. Drew Edmondson, was by me |
| LO | sworn to testify the truth; that the deposition was |
| 11 | taken by me in stenotype and thereafter transcribed, |
| 12 | and is a true and correct transcript of the testimony |
| 13 | of the witness; that the deposition was taken on the |
| 14 | 11th day of October, 2004, at 9:20 a.m., in the City |
| 15 | of Oklahoma City, County of Oklahoma, State of |
| 16 | Oklahoma; that I am neither attorney for nor |
| 17 | relative of either of said parties, or otherwise |
| 18 | interested in the event of said action. |
| 19 | IN WITNESS WHEREOF, I have hereunto set my |
| 20 | hand and official seal on this, the 21st day of |
| 21 | October, 2004. |
| 22 | 1 0 1 1 |
| 23 | Kim Zhouer |
| 24 | Representative for Kim Glover, CSR, RPR, RMR |
| 25 | Oklahoma Certified Shorthand Kim Glover Reporter, CSR #201 Oklahoma Certified Shorthand Reporter Certificate No. 0201 Exp. Date: December 31, 2004 |